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Liaison Counsel for the Direct Purchaser Plaintiff Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re: Effexor XR Antitrust Litigation

This document relates to:

All actions

Lead case: 3:11-cv-05479-PGS-LHG

NOTICE OF PLAINTIFFS' MOTION TO COMPEL

**To: Steve Moore
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PLEASE TAKE NOTICE that on May 6, 2019, or such other date as the Court shall determine, the undersigned, counsel for the Plaintiffs in the above-captioned litigation will move for an Order compelling Zydus Pharmaceuticals

(USA) Inc. and Cadila Healthcare Limited (together, “Zydus”) to produce certain categories of documents in response to Plaintiffs’ subpoena to Zydus.

PLEASE TAKE FURTHER NOTICE that in support of the motion, Plaintiffs will rely upon the Memorandum of Law in Support of Plaintiffs’ Motion to Compel Zydus Pharmaceuticals U.S.A. and Cadila Healthcare Limited to Produce Documents and Declaration of A. Luke Smith in Support of Plaintiffs’ Motion to Compel Zydus Pharmaceuticals U.S.A. and Cadila Healthcare Limited to Produce Documents (and the exhibits thereto), submitted herewith.

Dated: March 27, 2019

Respectfully submitted,

/s/ **Matthew F. Gately**

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